

## COMMONWEALTH OF MASSACHUSETTS

Barnstable, ss.

Superior Court

Superior Court  
Barnstable, ss

Filed FEB 14 2019

  
Clerk

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COMMONWEALTH )  
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 )  
v. )  
 )  
EMORY G. SNELL, JR., )  
Defendant )  
 )  
\_\_\_\_\_

No. 1995CR46579

AFFIDAVIT OF COUNSEL

The undersigned deposes and states:

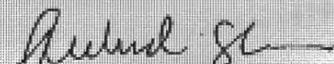
1. My name is Richard J. Shea. I am appointed counsel for Emory Snell in support of his new trial motion in this case. Mr. Snell, to the best of my knowledge is indigent.

2 Thomas Young, M.D., for whom expert funds are sought, is a forensic pathologist in Kansas City, MO. In or about 2009, he traveled to Boston to review the OCME file on the autopsy in this case. Thereafter, he prepared a report and a supplement for predecessor counsel. A copy of his Curriculum Vitae is available to the Court.

3. I have spoken with Dr. Young recently to estimate what his hours and costs would be to prepare for the evidentiary hearing in this case, including video conferencing with counsel, and travel to and from Boston for his testimony. \$8,000 in approved funds should be more than enough to cover his anticipated time and costs.

4. Sam P. Gulino, M.D. is a very experienced forensic pathologist in Philadelphia, PA. At my request, has reviewed the autopsy file provided him and spoken with me about his preliminary findings. In order for him to prepare a written report and consult further with counsel, his estimated time should cost \$1,000 or less. A copy of his Curriculum Vitae is available to the Court.

Signed under pains and penalties of perjury, this 12<sup>th</sup> day of February 2019.

  
By: Richard J. Shea, Esq.  
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